

REMARKS

Applicants have carefully reviewed the Application in light of the Office Action dated September 23, 2003. At the time of the Office Action, Claims 1-22 were pending. Applicants have amended Claims 1, 4, 12 and 15, and cancelled Claims 2-3 and 13-14. Applicants respectfully request reconsideration of the pending claims and favorable action in this case. Applicants have responded to each notation by the Examiner.

Applicants thank the Examiner for conducting a telephone interview on December 10, 2003. The changes to the claims being made herein were discussed. In addition, differences between the prior art used by the Examiner to reject the claims and the invention were discussed. No agreement was reached as to whether the amended claims are allowable.

Section 112 Rejections

The Examiner objected to Claims 2 and 13 because in line 3 "identifiers" should be replaced with "identifies." Claims 2 and 13 have been cancelled so this objection is moot.

Section 102/103 Rejections

The Examiner rejected Claims 1-3, 5-10, 12-14, and 16-21 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,058,380 issued to Anderson et al. ("*Anderson*"). The Examiner rejected Claims, 4, 11, 15, and 22 under 35 U.S.C. §103(a) as being unpatentable over *Anderson* in view of U.S. Patent No. 5,926,810 issued to Noble et al. ("*Noble*"). Applicants respectfully traverse this rejection.

Independent Claims 1 and 12 have been amended without prejudice or disclaimer in order to advance prosecution. The passages of *Anderson* relied upon by the Examiner fail to teach multiple limitations as set forth in amended Claims 1 and 12. First, *Anderson* does not teach associating both (a) a first vendor identifier with ones of the accounts payable items wherein the first vendor identifier uniquely identifies a first vendor associated with the first vendor name and (b) a second vendor identifier with ones of accounts payable items wherein the second vendor identifier indicates a relationship between the first vendor and a second vendor. The passage relied upon by the Examiner in Column 12-13 of *Anderson* simply teaches the storage of information about vendors in a vendor database which may include a vendor name and vendor identification number. Second, the passage relied upon by the Examiner does not teach associating identifiers with accounts payable items. Rather, this

passage simply talks about storing information in a "vendor master file." The description of accounts payable generation and formatting in Columns 10-11 suggests that accounts payable are handled by the customer's accounts payable system, while the system described in Anderson is an intermediary system.

These differences provide significant advantages over prior art systems. For example, as described on page 26 of the specification, vendor identifiers of the type claimed may be used in a large organization to determine that while relatively small amounts are spent with individual vendors, a relatively large amount may be spent with a group of related vendors. The invention allows vendor identifiers to be used to systematically generate reports that would reveal these aggregate large expenditures. Neither Anderson alone nor Anderson in combination with Noble appears to allow this advantage to be achieved.

While not relevant to the Examiner's 102 rejection, Applicants wish to note that the passage relied upon by the Examiner in Noble appears to teach a general ledger system that may be shared by multiple subsidiaries of a corporation (see Col. 10, ll. 62-68). The accounts payable information in this system appears to have a feature that partitions data according to the organization to which the information belongs. (Col. 11, ll. 1-25). Thus, this system merely allows the system to identify what data belongs to what organization. In the context of Noble, the relevant data associated with an accounts payable item would appear to be a customer name, not a vendor name. Moreover, like Anderson, the passage relied upon by the Examiner fails to teach associating both a first and second vendor identifier as claimed in amended Claims 1 and 12.

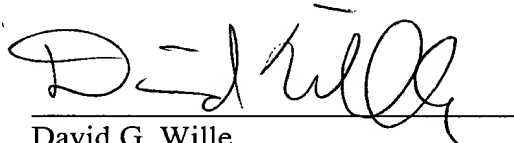
For the foregoing reasons, Applicants believe that Claims 1 and 12 are not anticipated by or obvious in light of Anderson, Noble, or a combination thereof. Claims 4-11 and 15-22 depend upon Claims 1 and 12, respectively. Thus, these claims are allowable for the same reasons that Claims 1 and 12 are allowable.

CONCLUSION

Applicants have now made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons and for other reasons clear and apparent, Applicants respectfully request reconsideration and allowance of the pending claims.

Applicants do not believe any fees are due. However, the Commissioner is hereby authorized to charge any additional fees or credit any overpayment to Deposit Account No. 05-0765 of Electronic Data Systems Corporation. If there are matters that can be discussed by telephone to advance prosecution of this application, Applicant invites the Examiner to contact its attorney at the number provided below.

Respectfully submitted,
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